

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

LUCILLE HALL,)
)
Plaintiff,)
)
v.) **CIVIL ACTION NO.**
) **2:06 CV 946-MHT (WO)**
GENPAK, L.L.C.,)
)
Defendant.)

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on Monday, January 22, 2007, and was attended by J.D. Spears-Turk on behalf of Plaintiff Lucille Hall, and Robin Adams on behalf of Defendant Genpak, LLC.

2. **Pre-Discovery Disclosures.** The parties will exchange the information required by Local Rule 26.1(a)(1) on or before February 19, 2007.

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

a. Discovery will be needed on the subjects:

All claims and defenses of the Plaintiff and the Defendant.

b. All discovery commenced in time to be completed by **June 29, 2007.**

c. Maximum of **25** interrogatories by each party to any other party without prior approval of the Court. Maximum of **25** requests for production by each party to any other party without prior approval of the Court. (Responses due **30** days after service).

- d. Maximum of 5 depositions by Plaintiff and 5 by Defendant without the prior approval of the Court.
- e. Expert testimony: Unless modified by the stipulation of the parties, the disclosure of expert witnesses, including a complete report under Fed.R.Civ.P. 26(a)(2)(B) from any specially retained or employed expert are due:
 - i. from **Plaintiff by March 12, 2007**
 - ii. from **Defendant by April 13, 2007**
- f. Electronic discovery: The parties will specify the form in which they request electronically stored information be produced in their discovery requests. Upon receipt of discovery requests, the responding party will notify the requesting party within 15 days as to any issues relating to the disclosure or discovery of electronically stored information and the parties will work in good faith to resolve the issues. The parties further agree that if the issue of producing privileged materials prevents a party from receiving requested electronic discovery, the parties will work together in good faith to develop a plan addressing the producing party's privilege concerns and the disclosure of relevant and responsive information.
- g. Supplementation under Rule 26(e) due no later than 30 days before the close of discovery.

4. **Other Items.**

- a. The parties do not request a conference with the Court prior to entry of the Scheduling Order.

- b. Plaintiff should be allowed until February 20, 2007 to join additional parties.
- c. Defendant should be allowed until March 8, 2007 to join additional parties and to amend the pleadings.
- d. All potentially dispositive motions should be filed by July 13, 2007.
- e. The parties are receptive to mediation but do not request Court ordered mediation at this time. The usefulness of Alternative Dispute Resolution procedures cannot be evaluated until the parties exchange initial disclosures and engage in written discovery.
- f. The Parties request a pretrial conference in or after October 2007.
- g. Final lists of trial evidence under Rule 26(a)(3) should be due pursuant to the terms of the pretrial order.
- h. Parties should have 14 days after service of final lists of trial evidence to list objections under Rule 26(a)(3).
- i. The case should be ready for trial by November 2007 and at this time is expected to take approximately **2 days**.

Respectfully submitted: January 24, 2007.

s/ Robin Adams

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Genpak, L.L.C.

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s/ Janice Spears-Turk _____

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